

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

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|----------------------------------|------------------------|
| In Re: | Case No.: 10-06642 BKT |
| CARLOS M SANCHEZ QUIÑONES | Chapter 13 |
| <u>Debtor(s)</u> | |

MOTION TO INFORM AMENDED PLAN

TO THE HONORABLE COURT:

NOW COMES the debtor, through the undersigned attorney, and very respectfully alleges and prays:

1. That today the debtor is filing an amended chapter 13 repayment plan.
2. That the reason for amendment is to consent lift of stay in favor of Asoc. de Residentes de River Garden, Banco Popular of PR, Crim and IRS. (Claims #2,3,4,6 &7)

WHEREFORE, it is respectfully requested to this Honorable Court to take notice of the aforementioned.

RESPECTFULLY SUBMITTED.

I HEREBY CERTIFY that a true and exact copy of the foregoing motion has been filed electronically with the Clerk of the Court using CM/ECF systems which will send notification of such to the Chapter 13 Trustee, and we sent copy of this document through regular mail to debtor (s) and all non CM/ECF participants interested parties to their addresses listed on the master address list.

In San Juan, Puerto Rico this 3rd day of February of 2011.

JPC LAW OFFICE

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By: /s/ Jose M Prieto Carballo, Esq.

United States Bankruptcy Court
District of Puerto Rico

IN RE:

SANCHEZ QUINONES, CARLOS M

Debtor(s)

Case No. 10-06642-13

Chapter 13

CHAPTER 13 PAYMENT PLAN

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee directly by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

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|---|--|---|
| PLAN DATED: _____ <input type="checkbox"/> PRE <input type="checkbox"/> POST-CONFIRMATION | | <input checked="" type="checkbox"/> AMENDED PLAN DATED: <u>2/03/2011</u> Filed by: <input checked="" type="checkbox"/> Debtor <input type="checkbox"/> Trustee <input type="checkbox"/> Other |
| <p>I. PAYMENT PLAN SCHEDULE</p> <p>\$ <u>850.00</u> x <u>60</u> = \$ <u>51,000.00</u></p> <p>\$ _____ x _____ = \$ _____</p> <p style="text-align: right;">TOTAL: \$ <u>51,000.00</u></p> <p>Additional Payments: \$ _____ to be paid as a LUMP SUM within _____ with proceeds to come from:</p> <p><input type="checkbox"/> Sale of Property identified as follows: _____ _____ _____</p> <p><input type="checkbox"/> Other: _____ _____ _____</p> <p>Periodic Payments to be made other than, and in addition to the above: \$ _____ x _____ = \$ _____</p> <p>PROPOSED BASE: \$ <u>51,000.00</u></p> <p>III. ATTORNEY'S FEES (Treated as § 507 Priorities)</p> <p>Outstanding balance as per Rule 2016(b) Fee Disclosure Statement: \$ <u>2,594.00</u></p> <p>Signed: <u>/s/ CARLOS M SANCHEZ QUINONES</u> Debtor</p> <p>Joint Debtor</p> | | <p>II. DISBURSEMENT SCHEDULE</p> <p>A. ADEQUATE PROTECTION PAYMENTS OR _____ \$ _____</p> <p>B. SECURED CLAIMS: <input type="checkbox"/> Debtor represents no secured claims. <input checked="" type="checkbox"/> Creditors having secured claims will retain their liens and shall be paid as follows:</p> <ol style="list-style-type: none"> 1. <input type="checkbox"/> Trustee pays secured ARREARS: Cr. _____ Cr. _____ # _____ # _____ \$ _____ \$ _____ 2. <input checked="" type="checkbox"/> Trustee pays IN FULL Secured Claims: Cr. <u>BBVA</u> Cr. _____ Cr. _____ # <u>0324962977335</u> # _____ # _____ \$ <u>17,748.00</u> \$ _____ \$ _____ 3. <input type="checkbox"/> Trustee pays VALUE OF COLLATERAL: Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ 4. <input checked="" type="checkbox"/> Debtor SURRENDERS COLLATERAL to Lien Holder: <u>BPPR (748)</u> <u>BPPR (7416)</u> <u>CRIM</u> 5. <input type="checkbox"/> Other: _____ _____ _____ 6. <input type="checkbox"/> Debtor otherwise maintains regular payments directly to: _____ _____ _____ <p>C. PRIORITIES: The Trustee shall pay priorities in accordance with the law. 11 U.S.C. § 507 and § 1322(a)(2)</p> <p>D. UNSECURED CLAIMS: Plan <input type="checkbox"/> Classifies <input checked="" type="checkbox"/> Does not Classify Claims.</p> <ol style="list-style-type: none"> 1. (a) Class A: <input type="checkbox"/> Co-debtor Claims / <input type="checkbox"/> Other: _____ <input type="checkbox"/> Paid 100% / <input type="checkbox"/> Other: _____ Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ 2. Unsecured Claims otherwise receive PRO-RATA disbursements. <p>OTHER PROVISIONS: (Executive contracts; payment of interest to unsecureds, etc.) See Continuation Sheet</p> |

CHAPTER 13 PAYMENT PLAN
Continuation Sheet - Page 1 of 1

FAILURE TO TIMELY OBJECT TO THIS PLAN BY A CREDITOR CONSTITUTES A WAIVER OF THE EQUAL MONTHLY AMOUNT METHOD OF PAYMENT 11 USC 1325 (a)(5).

ATTORNEY'S FEES WILL BE PAID AHEAD OF SECURED CREDITORS PER 11 USC 330.

TAX REFUNDS, IF ANY ARE RECEIVED BY DEBTOR, WILL BE TENDERED TO THE TRUSTEE AS PERIODIC PAYMENTS TO FUND THE PLAN UNTIL PLAN COMPLETION IN ADDITION TO PAYMENTS ALREADY PROVIDED HEREIN. IF DEBTOR(S) NEED TO USE ANY PART OF THESE FUNDS, PROPER AUTHORIZATION WILL BE SOUGHT FROM THE COURT FOR SUCH PURPOSE.

DEBTORS WILL PROVIDE INSURANCE IN FAVOR OF BBVA THROUGH EASTERN AMERICAN INSURANCE INC.

\$200 ADEQUATE PROTECTION TO BBVA

DEBTOR LIFTS THE AUTOMATIC STAY IN FAVOR OF ASOCIACION DE RESIDENTES DE RIVER GARDEN CLAIM 2-1

DEBTOR LIFTS THE AUTOMATIC STAY IN FAVOR OF IRS CLAIM 3-1

DEBTOR LIFTS THE AUTOMATIC STAY IN FAVOR OF CRIM CLAIM 4-1

DEBTOR LIFTS THE AUTOMATIC STAY IN FAVOR OF BPPR CLAIM 6-1 AND 7-1

Label Matrix for local noticing
0104-3
Case 10-06642-BKT13
District of Puerto Rico
Old San Juan
Tue Dec 14 16:28:12 AST 2010

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US DEPT OF JUSTICE TAX DIVISION
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CANOVANAS, PR 00729-1612

MUNICIPIO DE TRUJILLO ALTO
P O BOX 1869
TRUJILLO ALTO, PR 00977-1869

NCO FINANCIAL SYSTEM
P O BOX 192478
SANJUAN, PR 00919-2478

PR LABOR DEPT
P O BOX 191020
SAN JUAN, PR 00919-1020

RESURGENT CAPITAL SERV LP
GC SERVICES LIMITED PARTNERSHIP
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P O BOX 10584
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|---------------------|----|
| End of Label Matrix | |
| Mailable recipients | 36 |
| Bypassed recipients | 0 |
| Total | 36 |